## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

CRIMINAL No.1:24-CR-10391- IT

v. MAHDI MOHAMMAD SADEGHI, a/k/a MOHAMMAD MAHDI SADEGHI

Defendant

## ASSEMTED-TO MOTION FOR LEAVE TO FILE GOVERNMENT'S SUPPLEMENTAL MEMORANDUM IN SUPPORT OF DETENTION AND THE ACCOMPANYING EXHIBIT UNDER SEAL

The United States of America, by Joshua Levy, United States Attorney, Jared C. Dolan and Alathea E. Porter, Assistant United States Attorneys, and Christina Clark, Trial Attorney, National Security Division, hereby moves for leave to file its Supplemental Memorandum in Support of Detention and Exhibit 1 under seal.

As grounds for this request, the government states that both the Memorandum and Exhibit contain the names of individuals who are not charged nor under investigation at this time. Given the sensitive and confidential nature of the material in the Memorandum and Exhibit, the Government is seeking to protect the privacy of those individuals and any information related to financial transactions involving those individuals.

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The undersigned conferred with counsel for the Defendant Mahdi Mohammad Sadeghi who assents to the motion for leave to file under seal.

Respectfully submitted,

JOSHUA S. LEVY United States Attorney

By: /s/ Jared C. Dolan

JARED C. DOLAN

ALATHEA E. PORTER

Assistant United States Attorneys

District of Massachusetts

CHRISTINA A. CLARK

Trial Attorney

National Security Division

United States Department of Justice

## **CERTIFICATE OF SERVICE**

I certify that, on January 17, 2025, I caused a copy of the foregoing document to be served via the ECF system on all counsel of record.

/s/ Alathea E. Porter
Alathea E. Porter

Assistant United States Attorney

Date: January 17, 2025